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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

NO. CR 11-97-RE

v.

INDICTMENT

**BRANDON LEONARD MAYNARD,
and
BROOKE ASHLEY SNYDER,**

**21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and
853**

UNDER SEAL

Defendants.

THE GRAND JURY CHARGES:

**Count 1:
[Distribution of MDMA]**

On or about August 3, 2010, in the District of Oregon, **BRANDON LEONARD MAYNARD** and **BROOKE ASHLEY SNYDER**, defendants herein, did knowingly and intentionally distribute 3,4 - methylenedioxymethamphetamine hydrochloride (MDMA HCl), a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 2:
[Distribution of MDMA]

On or about July 15, 2010, in the District of Oregon, **BRANDON LEONARD MAYNARD** and **BROOKE ASHLEY SNYDER**, defendants herein, did knowingly and intentionally distribute 3,4 - methylenedioxymethamphetamine hydrochloride (MDMA HCl), a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Criminal Forfeiture Allegation:
[Narcotics Offense]

Upon conviction of a controlled substance offense listed above, **BRANDON LEONARD MAYNARD** and **BROOKE ASHLEY SNYDER**, defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

DATED this 24 day of February 2011.

A TRUE BILL.

OFFICATING FOREPERSON

Presented by:
DWIGHT C. HOLTON, OSB # 09054
United States Attorney


SCOTT M. KERIN, OSB # 965128
Assistant United States Attorney